

MEMO

TO: The Honorable Blount County Commission

FROM: Benjamin Roe, DO
Blount County EMS Medical Director

RE: Ambulance Ordinance

DATE: 08/04/2026

The attached proposed ordinance establishes supplemental county standards for any entity seeking to operate an ambulance service within Blount County.

Tennessee licenses ambulance services under the Rules of the Department of Health, Chapter 1200-12-01. Those rules set the minimum standards an operator must meet to hold a license anywhere in the state, and they are enforced from Nashville through periodic inspection and a complaint driven process. They are written to be workable in all ninety-five counties, and they do not account for the terrain, weather, call geography, or mutual aid network specific to Blount County.

The proposed ordinance does not replace state licensure, does not lower any state requirement, and does not restrict the number of services that may operate here. It adds a defined set of county conditions on top of the state license and provides a means of enforcing them locally. Each provision below addresses a point where the state standard is either silent or set below what conditions in this county require.

Summary of supplemental provisions

1. Ambulance age and mileage limits. No ambulance used for non-emergency patient transportation shall be placed in or continued in service beyond ten (10) years of age or two hundred fifty thousand (250,000) odometer miles. State standard: no age or mileage cap; roadworthiness judged by inspection alone.
2. Inclement weather capability. Ambulances shall be equipped with snow chains or four-wheel drive. Supervisory and response vehicles shall be four-wheel drive or all-wheel drive. Any support vehicle used for patient movement shall be capable of supine transport. State standard: silent.
3. County certification by the Medical Director. In addition to a valid state license, an operator shall hold a certificate of county operating authority issued by the Blount County EMS Medical Director. State standard: state license only.
4. Fixed base of operations within Blount County. An operator shall maintain a permanent base of operations located within the county, which must satisfy the conditions specified in the

ordinance, including [staffing, vehicle housing, secure supply and medication storage, and on-site records]. State standard: silent as to location.

5. Emergency response only upon dispatch by the Blount County Communications Center. No licensed operator shall initiate an emergency response within the county except upon dispatch by BCCC. State standard: restricts self-dispatch only as to first responder organizations.

6. Prohibition on advertising a ten-digit number for emergency response. No operator shall advertise or hold out a ten-digit telephone number as a means of summoning emergency medical response within the county. The provision reaches emergency solicitation only and does not apply to business, billing, or scheduled-transport lines. State standard: silent.

7. Mutual aid agreements required. An operator shall maintain current written mutual aid agreements with the other licensed EMS agencies operating in the county. State standard: silent.

8. Records open to inspection. Patient care, personnel, training, and vehicle maintenance records shall be open to inspection by the county and by the EMS Medical Director, subject to applicable privacy law. State standard: inspection authority runs to the Department only.

9. Local enforcement. The Medical Director may issue citations for violation. Civil penalties of not less than fifty dollars (\$50.00) and not more than five hundred dollars (\$500.00) per day per violation may be assessed, with jurisdiction in the General Sessions Court of Blount County. The certificate of county operating authority may be suspended or revoked for cause, subject to the notice and appeal process set out in the ordinance. State standard: enforcement is a state administrative process.

This ordinance does not do the following:

- It does not supersede, weaken, or duplicate any requirement of Chapter 1200-12-01. State licensure remains a prerequisite.
- It does not cap the number of operators or create an exclusive franchise.
- It does not restrict incoming mutual aid, air medical response, or interfacility transport arrangements made by hospitals.
- It does not alter the operating authority of any recognized rescue squad under state law.

I will be available during the work group 8/11 to answer any questions.

Respectfully submitted,

Benjamin Roe, DO
Blount County EMS Medical Director